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Counsel for Defendant ALEXANDER

**FILED**

DEC 01 2009

NORTH

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREGORY ALEXANDER,

Defendant.

No. CR 09-719 MHP

STIPULATION and ~~PROPOSED~~  
ORDER TO MODIFY TRAVEL  
RESTRICTION CONDITION ON BOND

Court: The Honorable Patricia V. Trumbull

Undersigned counsel stipulate as follows:

1. Defendant Gregory Alexander's grandmother, Nora Hunt, recently suffered a severe stroke that has left her in need of the attention of family members;
2. Nora Hunt raised Mr. Alexander, and is thus more like a mother than a grandmother to him;
3. Mr. Alexander would like the permission of the Court to visit Ms. Hunt as the needs of his family dictate, for the express purpose of providing care to Ms. Hunt when other family members are unable to do so;
4. Mr. Alexander is thus requesting this Court to extend his travel restriction on his bond to include the Central District of California, for the sole and express purpose of allowing him to visit his grandmother at 928 Marcy Way San Jacinto, CA 92582 as often as is necessary to meet the needs of her care at this time;

- 1           5.     Assistant United States Attorney Richard Cheng has no opposition to Mr.  
2                 Alexander's request to include the Central District of California as a place Mr.  
3                 Alexander may visit as needed, for the sole and express purpose of visiting Ms.  
4                 Hunt and not for any other purpose;
- 5           6.     Defense counsel has contacted both Kelly Neumeister, the supervising Pretrial  
6                 Services Officer in the Western District of Washington, as well as Anthony  
7                 Granados, the supervising Pretrial Services Officer in this district. Neither have  
8                 an opposition to defense counsel's request to extend the travel condition of Mr.  
9                 Alexander's bond;
- 10          7.     Defendant Alexander hereby agrees that he will provide Pretrial Services with an  
11                 itinerary for travel when he is called upon to visit his grandmother, including  
12                 dates of travel, flight numbers and times, and the name and address of the location  
13                 at which he will be staying (in the event that he is not staying at his grandmother's  
14                 residence.)

15  
16     IT IS SO STIPULATED.

17     DATED:     November 16, 2009

\_\_\_\_\_/S/\_\_\_\_\_  
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19                     ELIZABETH M. FALK  
20                     Assistant Federal Public Defender

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22     DATED:     November 16, 2009

\_\_\_\_\_/S/\_\_\_\_\_  
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24                     RICHARD CHENG  
25                     Assistant United States Attorney

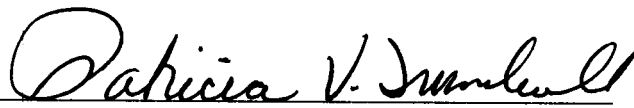
26     I hereby attest that I have on file all holographic signatures indicated by a "conformed"  
27     signature (/S/) within this efiled document.  
28

~~[PROPOSED]~~ ORDER

GOOD CAUSE APPEARING, it is hereby ORDERED that defendant Gregory Alexander's bond conditions be modified as follows: along with the Northern District of California and the Western District of Washington, Mr. Alexander is hereby permitted to travel to the Central District of California; specifically, he is permitted to travel by airplane from Seattle, Washington to an airport within driving distance of San Jacinto, California, for the express purpose of visiting Nora Hunt, at 928 Marcy Way, San Jacinto, CA 92582 as her medical needs dictate. Mr. Alexander's travel in the Central District of California is hereby limited to San Jacinto and the surrounding area, as required to allow him to travel from Seattle to San Jacinto by airplane and drive from a surrounding airport (including as possible airports the John Wayne Airport, the Ontario Airport, the Burbank Airport, or Los Angeles Airport) to his grandmother's residence in San Jacinto. He may only enter the Central District of California for the express purpose of visiting his grandmother, Nora Hunt.

IT IS SO ORDERED

DATED: 12/4/09

  
THE HONORABLE PATRICIA V. TRUMBULL  
UNITED STATES MAGISTRATE JUDGE